

BAY AREA AIR QUALITY MANAGEMENT DISTRICT

REGULATION 8 -- ORGANIC COMPOUNDS

RULE 32 -- WOOD PRODUCTS COATINGS

Amended June 19, 1996

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**REGULATION 8
ORGANIC COMPOUNDS
RULE 32
WOOD PRODUCTS COATINGS**

(Adopted September 21, 1983)

8-32-100 GENERAL

8-32-101 Description: The purpose of this Rule is to limit emissions of volatile organic compounds from the application of coatings to, and surface preparation of, any wood products, including furniture, cabinets and custom architectural millwork. This Rule shall not apply to residential noncommercial operations. (Amended April 17, 1991)

8-32-110 Deleted October 6, 1993

8-32-111 Exemption, Small Coating Operations: The provisions of this Rule shall not apply to facilities that use a total of less than 20 gallons of coating per year.
(Adopted April 17, 1991)

8-32-112 Exemption, Specific Operations: The provisions of this Rule shall not apply to the following specific coating operations:

112.1 Coatings and adhesives applied to Flatwood Paneling and Wood Flat Stock subject to the provisions of Regulation 8, Rule 23

112.2 Coating applied to stationary structures and their appurtenances subject to the provisions of Regulation 8, Rule 3 or Rule 48

112.3 Coating applied from aerosol cans subject to the provisions of Regulation 8, Rule 49

112.4 Adhesive coating subject to the provisions of Regulation 8, Rule 51.

(Adopted April 17, 1991; Amended November 18, 1992)

8-32-113 Exemption, Refinishing, Replacement and Custom Replica Furniture Operations: The provisions of Sections 8-32-302, 303, 304, 305 and 501 shall not apply to any refinishing operation necessary for preservation, to return the wood product or furniture to original condition, to replace missing furniture to produce a matching set, or to produce custom replica furniture.

(Adopted April 17, 1991; Amended June 19, 1996)

8-32-114 Exemption, Stencil Coatings: The provisions of this Rule shall not apply to the application of coatings by template in order to add designs, letters or numbers to products. The application of stencil coatings is subject to the provisions of Regulation 8, Rule 4.
(Adopted April 17, 1991)

8-32-115 Exemption, Specific Finishes: The provisions of Sections 8-32-301, 302, 303, and 304 shall not apply to coatings used to produce the following finishes, provided records are maintained as specified in Section 8-32-501:

115.1 Crackle lacquers

115.2 Leaf finishes

115.3 Faux finishes

115.4 Imitation wood grain

The application of coatings used to produce these specific finishes is subject to the provisions of Regulation 8, Rule 4. (Adopted April 17, 1991; Amended June 19, 1996)

8-32-116 Exemption, Musical Instruments: The provisions of this Rule shall not apply to the application of coatings to musical instruments.
(Adopted April 17, 1991)

8-32-117 Exemption, Polyester Resin Application: The application of polyester resin with a VOC content of less than 120 grams VOC per liter (1.0 pound VOC per gallon) shall be exempt from the spray application equipment limitations of Section 8-32-301.

(Adopted April 17, 1991)

8-32-118 Exemption, Patternmaking: The provisions of this Rule shall not apply to the application of coating to wood patterns used as tooling for the foundry industry. The application of such coating is subject to the provisions of Regulation 8, Rule 4.

(Adopted June 19, 1996)

- 8-32-119 Limited Exemption, Extreme Environmental Conditions:** Any wood product subject to extreme environmental conditions may be coated pursuant to the limits in Section 8-32-303, provided that the requirements of Section 8-32-403 are satisfied.
(Adopted June 19, 1996)
- 8-32-120 Recordkeeping Exemption, Low VOC Facilities:** Any facility subject to this Rule, in which low VOC coatings are exclusively stored and used shall be exempt from subsections 8-32-501.2, 501.4, 502.2, 502.3, and 503. For the purposes of this exemption, low VOC coatings are high solids coatings with a VOC content of no more than 275 grams per liter (2.3 lb/gal), as applied, and low solids coatings with a VOC content of less than 120 grams per liter (1.0 lb/gal), as applied. This exemption shall only apply if the requirements of Section 8-32-405 are satisfied.
(Adopted June 19, 1996)
- 8-32-200 DEFINITIONS**
- 8-32-201 Deleted April 17, 1991**
- 8-32-202 Binders:** Non-volatile polymeric organic materials (resins) which form surface film in coating applications.
- 8-32-203 Clear Topcoat:** The final coating which contains binders, but not opaque pigments, and is specifically formulated to form a transparent or translucent solid protective film.
- 8-32-204 Deleted April 17, 1991**
- 8-32-205 High Solids Stains:** Stains which are formulated to enhance wood grain and change wood color, but not conceal surface grain. For the purpose of this Rule, high solids stains are stains that contain at least 120 grams solids per liter (one pound solids per gallon) of coating.
(Amended April 17, 1991, June 19, 1996)
- 8-32-206 Pigmented Coatings:** Opaque coatings which contain binders and colored pigments which are formulated to hide the wood surface, either as an undercoat or topcoat.
- 8-32-207 Sanding Sealer:** A coating containing binders, which seals the wood prior to application of, and provides a sandable surface for, the subsequent coatings.
(Amended April 17, 1991)
- 8-32-208 Low Solids Stains:** Stains, dyes and toners which are formulated to enhance wood grain and change surface color, but not to conceal surface grain, and include sap stain, toner and non-grain raising stains. For the purpose of this Rule, low solids stains are stains that contain less than 120 grams solids per liter (1 pound solids per gallon) of coating.
(Amended April 17, 1991, June 19, 1996)
- 8-32-209 Transfer Efficiency:** The ratio of the weight of coating solids deposited on an object to the total weight of coating solids used in a coating application step, expressed as a percentage.
(Amended April 17, 1991)
- 8-32-210 Wash Coat:** A coating, containing binders, which penetrates into and seals wood, prevents undesired staining and seals in wood pitch. For the purpose of this Rule, washcoats shall be considered low-solids coatings and shall contain less than 120 grams solids per liter (1 pound solids per gallon) of coating. Wash coats with greater than 120 grams solids per liter (1 pound solids per gallon) of coating shall be considered sanding sealers.
(Amended April 17, 1991)
- 8-32-211 Wood Furniture:** Those surface coated room furnishings which are subject to Standard Industrial Classification Major Group 25 including tables, chairs, beds, sofas, dressers and standing screens made of solid wood, wood composition or wood material.
(Amended April 17, 1991)
- 8-32-212 General Wood Products:** For the purpose of this Rule, general wood products are those surface coated objects which are generally subject to Standard Industrial Classification Major Group 24 including cabinets, vanities, shutters, containers, frames, tools and ladders made of solid wood, wood composition or wood material. Custom cabinetry, including vanities, that are individually produced items designed for a specific space and client are not considered general wood products.
(Adopted April 17, 1991; Amended June 19, 1996)

- 8-32-213 Custom Architectural Millwork:** Those in shop finished wood products intended for use as architectural components including panels, doors and trim. Custom architectural millwork is individually produced items designed for a specific space and client. Custom trade show exhibits designed for a specific client shall be considered custom architectural millwork. (Adopted April 17, 1991; Amended June 19, 1996)
- 8-32-214 Volatile Organic Compound:** Any organic compound (excluding methane, carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates and ammonium carbonate) which would be emitted during use, application, curing or drying of a solvent or surface coating.
- 214.1 For purposes of calculating the VOC content of a high solids coating subject to subsections 8-32-302.1, 303.1 and 304.1, any water or the following compounds:
acetone
parachlorobenzotrifluoride (PCBTF)
cyclic, branched or linear, completely methylated siloxanes (VMS)
shall not be considered a part of the coating.
- 214.2 For purposes of calculating the VOC content of a low solids coating or solvent subject to subsections 8-32-302.2, 303.2 and 304.2, any water shall be considered a part of the coating. The following compounds:
acetone
parachlorobenzotrifluoride (PCBTF)
cyclic, branched or linear, completely methylated siloxanes (VMS)
shall not be considered part of the VOC content of the coating or solvent.
(Adopted April 17, 1991; Amended December 20, 1995, June 19, 1996)
- 8-32-215 Airless Spray:** Equipment used to apply coatings by use of fluid pressure without atomizing air, including heated airless spray. (Adopted April 17, 1991)
- 8-32-216 Air Assisted Airless Spray:** Equipment used to apply coatings that uses fluid pressure to atomized coating and air pressure between 0.1 and 50 psig to adjust the spray pattern. (Adopted April 17, 1991; Amended July 6, 1994)
- 8-32-217 High-Volume, Low-Pressure (HVLV) Spray:** Equipment used to apply coatings by means of a gun which operates between 0.1 and 10 atomizing psig air pressure.
(Adopted April 17, 1991; Amended October 6, 1993)
- 8-32-218 Electrostatic Air Spray:** Equipment used to apply coating by charging atomized particles that are deposited by electrostatic attraction. (Adopted April 17, 1991)
- 8-32-219 Detailing or Touch-up Guns:** Small air spray equipment, including air brushes, that operate at no greater than 5 cfm air flow and no greater than 50 psig air pressure and are used to coat small products or portions of furniture. (Adopted April 17, 1991)
- 8-32-220 Crackle Lacquer:** A clear or pigmented topcoat intended to dry to produce a cracked or crazed appearance. (Adopted April 17, 1991)
- 8-32-221 Filler:** A material whose primary function is to fill voids. (Adopted April 17, 1991)
- 8-32-222 Leaf Finish:** A finish used in conjunction with metal leaf or foil.
(Adopted April 17, 1991)
- 8-32-223 Faux Finish:** A finish intended to simulate a surface other than wood, including stone, sand, slate, marble, metal, metal flake or leather. (Adopted April 17, 1991)
- 8-32-224 Imitation Wood Grain:** A hand applied finish that simulates the appearance of a specific natural wood grain. (Adopted April 17, 1991)
- 8-32-225 Custom Replica Furniture:** Furniture individually produced for a specific client using methods of construction including materials, joinery and finishes authentic to the period and in keeping with the style of furniture. (Adopted April 17, 1991)
- 8-32-226 Key System Operating Parameter:** An air pollution abatement equipment operating parameter, such as temperature, flow rate or pressure, that ensures operation of the abatement equipment within manufacturer specifications and compliance with the standards in Sections 8-32-302, 303, and 304.
(Adopted June 15, 1994; Amended June 19, 1996)
- 8-32-227 Custom or Contract Furniture:** Those pieces of furniture designed and produced to order for a specific client as ordered by that client or a professional architect or designer. (Adopted June 19, 1996)
- 8-32-228 Extreme Environmental Conditions:** Any coating which during intended use is exposed to one or more of the following conditions:

- 228.1 Repeated heavy abrasion, mechanical wear, or abrasive agents,
 228.2 Temperature extremes significantly in excess of normal ambient conditions,
 228.3 Chronic exposure to corrosive, caustic or acidic chemicals, solutions or agents.
 (Adopted June 19, 1996)

8-32-300 STANDARDS

8-32-301 Spray Application Equipment Limitations: Any person who utilizes spray application equipment to apply coatings to wood products, furniture and cabinets shall use one or more of the following application methods:

Airless spray
 Air assisted airless spray
 High Volume Low Pressure (HVLP) spray
 Electrostatic air spray
 Detailing or Touch-up Guns

(Amended April 17, 1991)

8-32-302 General Wood Product Limits: A person shall not apply to any wood product, any coating with a VOC content in excess of the following limits; expressed as grams VOC per liter (pounds VOC per gallon) of coating as applied, unless emissions to the atmosphere are controlled to an equivalent level by air pollution abatement equipment with an abatement device efficiency of at least 85 percent that meets the requirements of Regulation 2, Rule 1.

302.1 High Solids Coatings:

	Effective July 1, 1992	Jeffective July 1, 1995
Clear Topcoat	550 (4.6)	275 (2.3)
Sanding Sealer	550 (4.6)	550 (4.6)
Pigmented Coating	600 (5.0)	275 (2.3)
High Solids Stain	700 (5.8)	700 (5.8)
Filler	500 (4.2)	500 (4.2)

302.2 Low Solids Coatings:

	Effective July 1, 1992	Effective July 1, 1995
Low Solids Stain	480 (4.0)	480 (4.0)
Wash-coat	480 (4.0)	480 (4.0)

(Deleted April 17, 1991; Re-adopted June 19, 1996)

8-32-303 Furniture, Custom Cabinetry and Custom Architectural Millwork Limits: A person shall not apply to any furniture, custom cabinet or custom architectural millwork, any coating with a VOC content in excess of the following limits; expressed as grams VOC per liter (pounds VOC per gallon) of coating as applied, unless emissions to the atmosphere are controlled to an equivalent level by air pollution abatement equipment with an abatement device efficiency of at least 85 percent that meets the requirements of Regulation 2, Rule 1.

303.1 High Solids Coatings:

	Effective July 1, 1992	Effective Sept 1, 1996
Clear Topcoat	550 (4.6)	550 (4.6)
Sanding Sealer	550 (4.6)	550 (4.6)
Pigmented Coating	600 (5.0)	550 (4.6)
High Solids Stain	700 (5.8)	700 (5.8)
Filler	500 (4.2)	500 (4.2)

303.2 Low Solids Coatings:

	Effective July 1, 1992	Effective Sept 1, 1996
Low Solids Stain	480 (4.0)	480 (4.0)
Wash-coat	480 (4.0)	480 (4.0)

(Adopted April 17, 1991; Amended October 6, 1993, July 6, 1994, June 19, 1996)

8-32-304 Custom and Contract Furniture Limits: A person shall not apply to any custom or contract furniture any coating with a VOC content in excess of the following limits;

expressed as grams VOC per liter (pounds VOC per gallon) of coating as applied, unless emissions to the atmosphere are controlled to an equivalent level by air pollution abatement equipment with an abatement device efficiency of at least 85 percent that meets the requirements of Regulation 2, Rule 1.

304.1 High Solids Coatings:

	Effective July 1, 1992	Effective July 1, 1997
Clear Topcoat	700 (5.8)	550 (4.6)
Sanding Sealer	700 (5.8)	550 (4.6)
Pigmented Coating	600 (5.0)	550 (4.6)
High Solids Stain	700 (5.8)	700 (5.8)
Filler	500 (4.2)	500 (4.2)

304.2 Low Solids Coatings:

	Effective July 1, 1992	Effective July 1, 1997
Low Solids Stain	800 (6.7)	480 (4.0)
Wash-coat	800 (6.7)	480 (4.0)

(Adopted April 17, 1991; Amended October 6, 1993; July 6, 1994, June 19, 1996)

8-32-305 Prohibition of Specification: No person shall require for use or specify the application of a coating subject to this Rule if such use or application results in a violation of any of the provisions of this Rule. The prohibition of this Section shall apply to all written or oral contracts under the terms of which any coating is to be applied to any wood product, furniture or cabinet at any physical location within the District. (Adopted April 17, 1991)

8-32-306 Compliance Statement Requirement: Effective August 1, 1991, the manufacturer of coatings subject to this Rule shall provide on the coating container or as an accompanying specification a designation of VOC content (as defined in Section 8-32-214) expressed in grams per liter or pounds per gallon of coating and expressed as grams VOC per gram solid or pounds VOC per pound solid.

(Adopted April 17, 1991; Amended June 19, 1996)

8-32-307 Alternate Compliance, Section 8-32-302, 303 and 304: In lieu of compliance with Section 8-32-302, 303 or 304, and provided a person is in receipt of the written authorization provided for in Section 8-32-404, compliance with the VOC limits may be achieved by averaging any or all coatings and solvent usage related directly to the coating of wood products. Compliance may be demonstrated by averaging for multiple day periods on a rolling basis for a period of no greater than thirty days.

(Adopted June 19, 1996)

8-32-320 Solvent Evaporative Loss Minimization: The requirements of this Section shall apply to any person using organic solvent for surface preparation and cleanup or to any person mixing, using or disposing of coating, adhesive or stripper containing organic solvent.

320.1 A person shall use closed containers for the storage or disposal of cloth or paper used for solvent surface preparation and cleanup.

320.2 A person shall store fresh or spent solvent in closed containers.

320.3 A person shall not use organic compounds for the cleanup of mixing, storage or spray equipment unless equipment for collecting the cleaning compounds and minimizing their evaporation to the atmosphere is used.

320.4 A person shall not leave containers of stripper, coating, adhesive, catalyst or thinner open to the atmosphere when not in use. (Adopted April 17, 1991)

8-32-400 ADMINISTRATIVE REQUIREMENTS

8-32-401 Deleted April 17, 1991

8-32-402 Deleted June 19, 1996

8-32-403 Extreme Environmental Conditions Petition: A person seeking an exemption pursuant to Section 8-32-119 shall comply with the following requirements:

- 403.1 A petition shall be submitted to the APCO containing the following information, as applicable: environmental conditions and coating performance requirements, volume of coating, and maximum VOC level necessary.
- 403.2 If the APCO grants written approval, such petition shall be repeated on an annual basis.
- 403.3 If the APCO grants written approval, such approval shall contain VOC and volume limit conditions.
- 403.4 Records must be maintained as per Section 501. (Adopted June 19, 1996)

8-32-404 Alternate Compliance Petition And Approval: Any person electing to comply with Section 8-32-307 shall submit to the APCO information regarding all coatings and solvents to be included in the alternate compliance formula. Such information shall include the VOC content in grams (or pounds) per gram (or pound) coating solid for high solids coatings, the VOC content in grams (or pounds) per liter (or gallon) of coating for low solids coatings and solvents, the expected quantity of each coating or solvent to be used, and a description of the products or coating line for which the approval is sought. The APCO shall evaluate each petition submitted and will respond to each petition that meets the criteria of Section 8-32-307 with written approval. A petitioner is subject to the limits contained in Section 8-32-302, 303 or 304 until receipt of the written approval. Any plan is subject to the following conditions:

- 404.1 Any emissions reductions credited to this plan must not be the result of emissions reduced due to violation of any District rule, or to achieve compliance with a provision of this rule at the effective date of that provision. Reductions achieved prior to the effective date of any standards in this rule may be used until the effective date.
- 404.2 Any emissions reductions shall not be used as credit pursuant to Regulation 2, Rule 4 or as contemporaneous offsets pursuant to Regulation 2, Rule 2.
- 404.3 No emissions reductions shall be credited for organic compounds that are adopted as compounds exempt from the definition of VOC found in Section 8-32-214 if those compounds are present in the coatings or solvents used at the facility prior to the date the compound becomes exempt.

(Adopted June 19, 1996)

8-32-405 Low VOC Facility Certification: In order to qualify for the recordkeeping exemption in Section 8-32-120, the owner or operator of a facility shall certify to the APCO that all coatings comply with the provisions of Section 8-32-120. Such certification shall be provided annually, concurrent with permit renewal. (Adopted June 19, 1996)

8-32-500 MONITORING AND RECORDS

8-32-501 Recordkeeping Requirements: Any person subject to Section 8-32-302, 303, 304, or 307 shall:

- 501.1 Maintain a current list of coatings in use which provides all of the data necessary to evaluate compliance, including the following information, as applicable:
 - a. coating, catalyst or reducer used
 - b. manufacturer's recommended mix ratio of components
 - c. VOC content of coating as applied
 - d. solids content of each
- 501.2 Record the following information on a daily basis, as applicable:
 - a. coating and mix ratio of components in the coating used
 - b. quantity of each coating applied
 - c. identification of coating category
 - d. type and amount of solvent used for cleanup and surface preparation
- 501.3 Record air pollution abatement equipment key operating parameters on a daily basis where such equipment is installed to meet the requirements of Sections 8-32-302, 303, and 304.
- 501.4 Records shall be retained and available for inspection by the APCO for the previous 24-month period.

(Adopted April 17, 1991; Amended June 15, 1994, June 19, 1996)

8-32-502 Refinishing, Replacement and Custom Replica Furniture Operations Recordkeeping Requirements: Any person refinishing wood products or furniture, replacing missing furniture or producing custom replica furniture shall:

502.1 Maintain a current list of coatings in use which provides the following information, as applicable:

- a. coating, catalyst or reducer used
- b. manufacturer's recommended mix ratio of components
- c. VOC content of coating or reducer

502.2 Record on a monthly basis the following information, as applicable:

- a. amount of coating, catalyst and reducer used
- b. type and amount of solvent used for cleanup and surface preparation
- c. type and amount of stripper used

502.3 Records shall be retained and available for inspection by the APCO for the previous 24-month period. (Adopted April 17, 1991; Amended June 15, 1994)

8-32-503 Custom Architectural Millwork and Cabinetry Recordkeeping Requirements: In addition to the requirements of Section 8-32-501, any person producing custom architectural millwork and cabinetry shall maintain and make available for inspection by the APCO job orders, shop drawings or blueprints, or designer or architectural drawings as necessary to establish the custom nature of the work.

(Adopted April 17, 1991; Amended June 19, 1996)

8-32-600 MANUAL OF PROCEDURES

8-32-601 Analysis of Samples: Samples of VOC as specified in subsections 8-32-302.1, 303.1 or 304.1 shall be analyzed as prescribed in the Manual of Procedures, Volume III, Method 21 or 22. Samples of VOC as specified in subsections 8-32-302.2, 303.2 or 304.2 shall be analyzed as prescribed in the Manual of Procedures, Volume III, Method 31. Samples containing parachlorobenzotrifluoride shall be analyzed as prescribed in the Manual of Procedures, Volume III, Method 41.

(Amended April 17, 1991, June 19, 1996)

8-32-602 Determination of Emissions: Emissions of volatile organic compounds as specified in Sections 8-32-302, 303 or 304 shall be measured as prescribed by any of the following methods: 1) BAAQMD Manual of Procedures, Volume IV, ST-7, 2) EPA Method 25 or 25A. When either EPA Method 25 or 25A is used, control device equivalency shall be determined as prescribed in 55 FR 26865 (June 29, 1990). For the purpose of determining abatement device efficiency, any acetone, PCBTF or VMS shall be included as Volatile Organic Compounds. A source shall be considered in violation if the VOC emissions measured by any of the referenced test methods exceed the standards of this rule.

(Adopted April 17, 1991; Amended June 15, 1994, June 19, 1996)

8-32-603 Emissions Averaging Procedure: The procedure for averaging coatings to determine compliance with Section 8-32-307 and sample calculations may be found in the Manual of Procedures, Volume I, Section 6. (Amended June 19, 1996)